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**VIA ECF**

Hon. Naomi Reice Buchwald  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
Courtroom 21A  
500 Pearl Street  
New York, NY 10007-1312

**Re:** *Savage v. Assoc. Newspapers Ltd., et al., No. 1:24-cv-03280-NRB*  
*Savage v. NYP Holdings, Inc., et al., No. 1:24-cv-03278-NRB*

Dear Judge Buchwald:

This firm represents all defendants (“Defendants”) in the above-referenced related cases. We are advised by Plaintiff’s counsel that Plaintiff has decided not to file an amended complaint in either of these cases. Accordingly, pursuant to the Court’s Orders in both cases dispensing with a pretrial conference, all parties have agreed to the following briefing schedule for Defendants’ motions to dismiss the complaints in both cases:

- Defendants will file their opening briefs by November 11, 2024
- Plaintiff will file his opposition to both motions by December 16, 2024
- Defendants will file their reply briefs by January 10, 2024

Respectfully submitted,

*/s/ Robert D. Balin*

Robert D. Balin